IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
,)	
v.)	Case no. 19-03167-02-CR-S-RK
DAVID R. CRAIG,)	
Defendant.)	
Defendant.		

MOTION FOR PRETRIAL RELEASE

- 1. Defendant is charged with conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and distribution of a controlled substance.
- 2. That on February 10, 2020, this Court held a hearing on the Government's motion for pretrial detention and after due consideration ordered the defendant to be detained on this matter without bail. This order was issued February 18, 2020.
- 3. That since that time the United States has found itself in the midst of the COVID-19 pandemic and defendant believes he is among the vulnerable population in respect to said virus and believes there has been a change of circumstances that merits the Court's review of its initial order. Specifically, defendant is 64 years of age and has a history of breathing difficulty and upper respiratory infections.
- 4. If released, defendant would agree to be supervised by Pretrial Services and would comply with any additional orders of this Court.
- 5. If released, defendant would reside at 4014 E. Kearney, Springfield, Missouri with his fiancée Barbara Rohlman. Defendant wishes the Court to know Ms. Rohlman is blind and needs his assistance.

WHEREFORE, Defendant respectfully requests the Court reconsider its ruling of February 18, 2020, in light of the coronavirus pandemic and his personal situation as a vulnerable person and grant him release pending trial or disposition of this matter.

Respectfully submitted,

/s/ Gary M. Wilson

Gary M. Wilson, Mo. Bar # 33877 1736 E. Sunshine, Ste. 817, Springfield, MO Attorney for Defendant David Craig

CERTIFICATE OF SERVICE

I hereby certify on this 30 th day of April, 2020, I electronically filed the foregoing document with the Clerk
of the Court using the CM\ECF system, which sent an email notice of such filing to all CM\ECF participants
in this case.

_/s/ Gary M. Wilson
Gary M. Wilson